

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

MARK and COLLEEN HOFFMAN,

Plaintiffs,

vs.

MEDTRONIC, INC., a Minnesota  
corporation; MEDTRONIC SOFAMOR  
DANEK, USA, INC.;

Defendants.

Hon Jerome B. Simandle, Chief Judge

Magistrate J. Ann Marie Donio

Civil Case No. 1:13-cv-06351-JBS-AMD

**CERTIFICATION OF KENT L. KLAUDT, ESQ.**

Kent L. Klaudt, in lieu of oath or affidavit hereby certifies as follows:

1. I am an attorney at Lieff Cabraser Heimann & Bernstein, LLP, a law firm located in San Francisco, California. I submit this Certification pursuant to L.Civ.R. 101.1(c) in support of Plaintiffs' Motion for an Order permitting me to appear in the above-entitled action *Pro Hac Vice*. I am personally familiar with the facts set forth herein.

2. I am a member in good standing of the Bar of the State of California and (California Bar No. 183903), admitted to the practice of law in California since 1996. I have never been disciplined, suspended or disbarred by these or any other Court.

3. Attached as exhibit A to this certification is my certificate of good standing issued by the California State Bar.

4. Plaintiffs have requested that I represent them in this action.

5. No disciplinary proceedings are pending against me in any jurisdiction, and no discipline has previously been imposed on me in any jurisdiction. I understand

that I have a continuing obligation during the period of my *Pro Hac Vice* admission to promptly advise the Court of a disposition made of pending charges or of the institution of any disciplinary proceedings.

6. There is good cause for this *Pro Hac Vice* admission, including the following reasons:

- a. This action involves complex issues of law and fact in which I am a specialist, and
- b. There has been an attorney/client relationship with the client for an extended period of time.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

Dated: January 17, 2014

By: \_\_\_\_\_



Kent L. Klaudt, Esq.

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# **EXHIBIT A**



## THE STATE BAR OF CALIFORNIA

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

### CERTIFICATE OF STANDING

September 10, 2013

#### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, KENT L. KLAUDT, #183903 was admitted to the practice of law in this state by the Supreme Court of California on December 3, 1996; that from the date of admission to December 31, 2003, he was an ACTIVE member of the State Bar of California; that on December 31, 2003, he transferred at his request to the INACTIVE status; that from that date to May 25, 2004, he was an INACTIVE member of the State Bar of California; that on May 25, 2004, he transferred at his request to the ACTIVE status; that he has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Louise Turner  
Custodian of Membership Records